



## Large Onsite Sewage System Rule Development Committee (LOSS-RDC)

### Meeting Summary

<b>Group or Committee:</b>	<i>Large Onsite Sewage System Rule Development Committee</i>		
<b>Meeting #:</b>	<i>First Meeting</i>		
<b>Date &amp; Time:</b>	<b><i>February 17, 2004 / 10:00 AM – 3:00 PM</i></b>		
<b>Meeting Site:</b>	<i>Sea-Tac Occupational Skills Center</i>		
<b>Facilitator:</b>	<i>Eric Svaren</i>		
<b>Member Attendance:</b>	<i>Linda Atkins Richard Benson, PE Anna Crickmer, PE Jerry Deeter, RS Terry Hull</i>	<i>Scott E. Jones, PE Arnold Larsen, PE Peter Lombardi Steven C. Marble Jim Sayre</i>	<i>John Stormon Bill Stuth, Jr. Robert F. Sweeney Kelly Wynn</i>
<b>Staff Attendance:</b>	<i>Maryanne Guichard Jane Lee</i>	<i>Marianne Seifert / SBOH Jeanne Robitaille</i>	<i>Mark Soltman</i>
<b>Guest Attendance:</b>	<i>Jim Gleason</i>		

#### Topics Discussed

- ▶ **Welcome & Introductions**
  - ▷ Committee members, staff, and facilitator were introduced.
- ▶ **Review of the Rule Development Process**
  - ▷ Marianne Seifert, liaison with the State Board of Health, reviewed the Rule Development Process for the group.
- ▶ **RDC “Working Agreement & Ground Rules”**
  - ▷ Eric Svaren, facilitator, presented the DRAFT Working Agreement (WA) to the group, and lead a discussion of the ground rules, addressing:
    - ▲ **Discussions**
    - ▲ **Decisions**
    - ▲ **Voting**
      - △ Discussion addressed the issue of the timeframe for review of issues and options with constituents before decision and voting by the group. A proposal for amending the WA to allow delay on voting by action of the group was discussed.
    - ▲ **Membership & Attendance**
      - △ Discussion addressed the importance of regular attendance to keep abreast of the topics and options being considered by the group.
    - ▲ **Meeting Records**
  - ▷ To assist the group, it was requested that committee staff endeavor to get study materials to the members as soon as possible, preferably no later than two weeks before the next scheduled meeting to provide adequate time for meeting preparation.
- ▶ **Future Meetings: Dates, Times & Length**
  - ▷ Eric & the group discussed meeting times & schedules
- ▶ **Review of Existing Rules & Standards for LOSS**
  - ▷ Mark Soltman presented a brief overview of the existing framework for rules and standards for Large Onsite Sewage Systems. Richard Benson extended the presentation when he shared a proposed DRAFT Rule framework and Section & Sub-section Index.

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### ► **Identification of Proposed Issues & Topics**

- ▷ Richard shared with the group a list of proposed issues and topics for discussion, based upon his review of the existing rules, standards, guidance and regulatory framework.

### ► **Priority Order for Addressing Identified Topics**

- ▷ Eric lead the group in identifying additional proposed topics and facilitated the group process to establish a priority listing of all the proposed topics.

### ► **"Parking Lot" Items Identified**

- ▷ Eric established a means to record miscellaneous questions, concerns, ideas, etc. so that these items would not be lost. The list of "Parking Lot" items will be posted at each meeting, and reviewed and added to as needed.

### Decisions Made

### ► **RDC "Working Agreement & Ground Rules"**

- ▷ Two modifications were made to the Working Agreement document and the document was adopted by the committee:
  - ▲ A provision to delay a decision in order to allow members to consult with constituents (decision to delay a decision would be a procedural vote action by the group); and,
  - ▲ A requirement that if a member cannot attend a meeting, that Jeanne Robitaille is to be notified in advance of the meeting.

### ► **Future Meetings: Dates, Times & Length**

- ▷ Dates for future meetings were identified: March 31, May 5, June 17, and July 22, 2004.
- ▷ Meeting times will be from 9:30 AM — 3:30 PM.

### ► **Identification of Proposed Issues & Topics**

- ▷ The group identified 35 issues and topics for discussion.

### ► **Priority Order for Addressing Identified Topics**

- ▷ Through a "place the dot" selection process, the group ranked the 35 topics. With the number of "dots" provided for each member, the outcome of the voting process left many topics with few or no votes. The committee expressed a strong interest in addressing the topics in groups of similar topics, including those with few votes.

### Follow-up Actions & Assignments

- Eric will finalize the Working Agreement, including the changes proposed and agreed upon by the group.
- Richard & Mark will review the proposed issues and topics, and assemble them in a proposed sequence of discussion based upon topical grouping, votes obtained, and time or scheduling required to conduct background or support work to adequately present the topics before the group for discussion and decision.
- Richard will continue to develop the committee's base document, the DRAFT 246-272B LOSS Rule, by melding the existing rule and guidance documents according to the suggested Section & Sub-section delineation.

### Agenda Items for Next Meeting

- Approve the Meeting Summary for the February 17, 2004 meeting.
- Review the Topic List and Discussion Categories
- Review the Decision Agenda format and process for discussion and decision-making.
- Discussion & Action on first topics: *Engineering Requirements & Design Standards*
- Introduce discussion topics for the 3<sup>rd</sup> meeting.

### Meeting Summary Attachments

- Working Agreement
- LOSS RDC List of Topics
- LOSS RDC "Parking Lot" of Ideas

*Large Onsite Sewage System Rule Development Committee  
(LOSS-RDC)*

Future Meeting	
<b>Meeting #:</b>	<i>Second Meeting</i>
<b>Date &amp; Time:</b>	<i>March 31, 2004 / 9:30 AM – 3:30 PM</i>
<b>Meeting Site:</b>	<i>Sea-Tac Occupational Skills Center</i>

<b>LOSS RDC Topics, Arranged by Category</b>	
<b>Discussion Topic</b>	<b>Category</b>
<b>Surface and groundwater impacts:</b> Establish better criteria for addressing impacts to surface and groundwater	<b>Engineering Requirements / Design Standards</b>
Allow LOSS with minimum 2 feet vertical separation under certain conditions	<b>Engineering Requirements / Design Standards</b>
<b>Wastewater strength:</b> Strengthen / clarify requirement to address wastewater strength and provide minimum treatment	<b>Engineering Requirements / Design Standards</b>
<b>Post construction documentation:</b> Strengthen requirements for Post Construction documentation (as built drawings, O&M manuals, construction reports)	<b>Engineering Requirements / Design Standards</b>
Clarify rule to assure all primary LOSS components are sized based on peak (not average) flows	<b>Engineering Requirements / Design Standards</b>
<b>Move some engineering guidance to rule:</b> Add selected standards from current DOH guidance documents to rule	<b>Engineering Requirements / Design Standards</b>
Develop minimum design criteria for high strength waste applications including RV dump stations and systems with RV hookups.	<b>Engineering Requirements / Design Standards</b>
<b>Septic tank sizing:</b> Revise septic tank sizing requirements consistent with 272A.	<b>Engineering Requirements / Design Standards</b>
<b>Pump chamber sizing:</b> Include new requirements for pump chamber sizing for LOSS	<b>Engineering Requirements / Design Standards</b>
<b>Duplex pumps:</b> Require duplex pumps	<b>Engineering Requirements / Design Standards</b>
<b>Timed dosing:</b> Require timed dosing	<b>Engineering Requirements / Design Standards</b>
Eliminate option for addressing waste strength without pretreatment by increasing drainfield sizing	<b>Engineering Requirements / Design Standards</b>
Reduce setback between LOSS drainfield sectors to 10 feet (consistent with bed requirements)	<b>Engineering Requirements / Design Standards</b>
Expand waiver criteria for 150% drainfield construction requirement to allow consideration of new treatment and/or distribution technologies under certain conditions	<b>Engineering Requirements / Design Standards</b>
<b>Inspection:</b> <ul style="list-style-type: none"> <li>➤ Strengthen requirements for engineer inspections</li> <li>➤ Assign authority to engineer to order/authorize covering LOSS</li> </ul>	<b>Construction</b>
Allow design engineer under certain conditions to conduct inspections and authorize cover of drainfield components with concurrence from Department.	<b>Construction</b>
<b>Multiple owners:</b> <ul style="list-style-type: none"> <li>➤ Refine and clarify public entity requirements</li> <li>➤ Add detail to private entity responsibilities including provisions from LOSS Management and Maintenance Guidelines</li> <li>➤ Allow additional management options where public entity is currently required –under certain conditions”</li> </ul>	<b>LOSS Management</b>
<b>Single Owner:</b> Clarify owner responsibilities and add detail from DOH “sample management agreement”	<b>LOSS Management</b>
<b>Operating permits:</b> Strengthen requirements for operating permits and annual reports	<b>LOSS Management</b>

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<b>LOSS RDC Topics, Arranged by Category</b>	
<b>Discussion Topic</b>	<b>Category</b>
<b>LOSS operator competency:</b> Require operator training, certification or service contract with qualified provider	<b>Practitioner Qualifications &amp; Roles</b>
<b>Qualified Installers:</b> Strengthen requirements to assure only qualified installers construct LOSS	<b>Practitioner Qualifications &amp; Roles</b>
Allow state agency employees to install, operate and maintain LOSS serving state facilities without requiring local approvals under certain conditions (subject to DOH or Ecology authorized training and/or certification program).	<b>Practitioner Qualifications &amp; Roles</b>
Develop a table/matrix to show roles/responsibilities of regulators and industry practitioners in various aspects of LOSS design, permitting, construction, management, and licensing/certification.	<b>Practitioner Qualifications &amp; Roles</b>
Allow only state or locally licensed professionals to site, design, construct, manage, inspect or permit LOSS.	<b>Practitioner Qualifications &amp; Roles</b>
<b>Requirement to connect to sewer:</b> Assign authority to Department to require owner to connect to public sewer upon failure and when sewer is within 200 feet	<b>Enforcement</b>
<b>Extreme non-compliance:</b> Strengthen enforcement options for cases of extreme non-compliance	<b>Enforcement</b>
<b>Jurisdictional splits:</b> Eliminate the current three-way split (Ecology / DOH / Local Health) to a two-way split (DOH / Local Health), specific to sub-surface disposal systems	<b>Ecology / DOH Coordination</b>
<b>Mechanical Treatment over 3500 GPD:</b> Allow DOH approval of mechanical treatment for LOSS under certain conditions	<b>Ecology / DOH Coordination</b>
<b>Flow splitting:</b> Refine / clarify the definition of a LOSS to prevent the practice of flow splitting of large projects to avoid Ecology or Health regulatory requirements	<b>Ecology / DOH Coordination</b>
<b>Reuse:</b> Encourage or require proponents to consider "reuse" options in LOSS project design / submittals	<b>Ecology / DOH Coordination</b>
Consolidate regulatory requirements and approval authority under one agency (Health) for all LOSS owned by state agencies (including systems above 14,500 GPD).	<b>Ecology / DOH Coordination</b>
<b>Program standards:</b> Develop LOSS program standards (approval criteria, inspections, reviewer competency, operating permits, etc.) for contract counties	<b>LOSS "Contract Counties"</b>
<b>DOH oversight of contract counties:</b> Provide for DOH oversight to assure program standards (see item 9 above) are met	<b>LOSS "Contract Counties"</b>
<b>Formal contracts:</b> Develop and sign consistent formal contracts with contract counties	<b>LOSS "Contract Counties"</b>
<b>DOH technical assistance to contract counties:</b> Provide or offer DOH technical assistance	<b>LOSS "Contract Counties"</b>